



Ohio
Republican
Party

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FEDERAL ELECTION
COMMISSION
PUBLIC DISCLOSURE
DIVISION

MAY 22 2 57 PM '97

Robert T. Bennett
Chairman

Martha C. Moore
Vice-Chairman

Federal Election Commission
999 "E" Street NW
Washington, DC 20463
Attn: Melissa Hurd, Reports Analyst

March 31, 1997

RE: Ohio Republican State and Central Executive Committee
October Quarterly Report (7/1/96-9/30/96)

FILE

Dear Ms. Hurd:

This letter is in response to the Commission's request for additional information regarding the above referenced reporting period. An itemization follows:

You have received contributions from Benesch, Friedlander, Coplan, etc. in the amount of \$1250.00 which needs to be attributed to partners based upon percentage of ownership.

This is a law firm operating as a partnership with 65 partners, allocating the \$1250.00 contribution results in a per partner contribution of \$19.23 which is below the \$200 reporting threshold therefore, the breakdown by partners was not reported.

You have received contributions from Crabbe, Brown, Jones, Potts etc., in the amount of \$500.00 which needs to be attributed to partners based upon percentage of ownership.

This is a law firm operating as a partnership with 19 partners, allocating the \$500.00 contribution results in a per partner contribution of \$26.31 which is below the \$200 reporting threshold therefore, the breakdown by partners was not reported.

Schedule A of your report discloses contributions which appears to exceed the limits set forth in the Act which are in excess of \$5,000 per calendar year.

Robert Castellini: Of the \$6,000 total contributions reported, \$1,000 was reported in error as these funds were actually deposited at the county level, Hamilton County Republican Party deposited these funds into their state account. Schedule A for the April 15, 1996 quarterly report has been corrected accordingly and is included with this response.

George Julfs: Of the \$6,000 total contributions reported, \$1,000 was reported in error as these funds were actually deposited at the county level. Hamilton County Republican Party deposited these funds into their state account. Schedule A for the April 15, 1996 quarterly report has been corrected accordingly and is included with this response.

Southwood Morcott: Of the \$6,000 total contributions reported, \$1,000 does represent an excess contribution. These funds have been reattributed to our state funds, copy of check issued is attached as documentation. This transfer to the state account will be reflected on our 1/1/97-6/30/97 report.

Star Bank: The contributions from Star Bank Corp. PAC did exceed the limit by \$2,500. Unfortunately the name was entered two different ways into our computer system which resulted in our not catching the error. This amount has been reattributed to our state funds and is included in the check copy which is attached. This transfer to the state account will be reflected on our 1/1/97-6/30/97 report.

You must make an attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. "Best Efforts"

For every entry supporting Line 11 (a)(i); we have clearly indicated if the person was retired, employed or if we had requested the employment information. Attached is a sample copy of our "best efforts" request. If contributor information was unattainable with our first effort, the caging department of our finance division attempted phone contact to obtain the information.

Schedule A, supporting Line 12 discloses a transfer-in from the Republican National Committee. Schedule B Line 21(b) reflects payments for various exempt activities. Please clarify the nature of the transfers-in and subsequent payments for all exempt activities.

From time to time the Republican National Committee transfers funds to the Ohio Republican State and Central Executive Committee. None of these funds were used for volunteer, exempt activities nor were these funds used for candidate specific programs.

Please clarify all expenditures made for Party Building Media on Schedule H4.

All expenditures for Party Building Media were for generic party activities and did not mention specific federal candidates and therefore, no allocation to a candidate was required.